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*Attorneys for Plaintiff Jonathan D. Rubin
in Rubin v. Facebook, Inc., et al.,
18-cv-01852-EMC*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CASE NO. 3:18-CV-01732-VC

LAUREN PRICE, on behalf of herself and
all others similarly situated,

Plaintiff,

v.

FACEBOOK, INC, and CAMBRIDGE
ANALYTICA, LLC

Defendants.

**PLAINTIFF JONATHAN D. RUBIN'S
RESPONSE IN SUPPORT OF
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES
SHOULD BE RELATED**

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TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Pursuant to Civil Local Rule 3-12(e) and 7-11(b), Plaintiff Jonathan Rubin in *Rubin v. Facebook, Inc., et al.*, Case No. 3:18-cv-01852-EMC (N.D. Cal., filed March 26, 2018) (“Rubin Action”), hereby files this Response in Support of Plaintiffs Theresa Beiner’s and Brandon Haubert’s (plaintiffs in the *Beiner, et al. v. Facebook, Inc., et al.*, No. 3:18-cv-1953 (N.D. Cal., Filed March 29, 2018) (“Beiner Action”)) Administrative Motion to Consider Whether Cases Should Be Related.

Plaintiff Rubin agrees that his action should be related to the five cases in this District, *Price v. Facebook, Inc., et al.*, Case No. 3:18-cv-01732 (filed March 20, 2018) (“Price Action”), *Gennock et al. v. Facebook, Inc., et al.*, Case No. 4:18-cv-01891 (filed March 27, 2018) (“Gennock Action”), *O’Kelly v. Facebook, Inc., et al.*, Case No. 3:18-cv-01915 (filed March 28, 2018) (“O’Kelly Action”), the Beiner Action; and *Haslinger v. Facebook, Inc.*, et al., Case No. 4:18-cv-01984-YGR (filed March 30, 2018) (“Haslinger Action”) (collectively with the Rubin Action, “The Actions”).

The Actions all concern substantially the same parties, property, transaction or event, in that they all concern the illicit harvesting of the sensitive and personal information of over 50 million American Facebook, Inc. (“Facebook”) users by Cambridge Analytica LLC (“Cambridge”) and the unauthorized repurposing of that sensitive user data to manipulate United States elections, including the 2016 presidential election. *See* Local Rule 3-12(a)(1).

In addition, if the actions are not related, there will certainly be duplication of labor and expense and a risk of conflicting results, as The Actions will all seek discovery into the same underlying conduct of Defendants Facebook and Cambridge and relief in each action will be based on that conduct. *See* Civ. L.R. 3-12(a)(2).

Accordingly, the Court should relate The Actions and assign them to this Court’s calendar under Civil Local Rule 3-12(f).

1 Dated: April 2, 2018

PHILLIPS, ERLEWINE, GIVEN & CARLIN LLP

3 By: /s/ Nicholas A. Carlin

4 Nicholas A. Carlin

5 Brian S. Conlon

6 Attorneys for Plaintiff

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